

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JAN 23 2003

PUBLIC SERVICE
COMMISSION

In the matter of:

Robert W. Long
(Your Full Name)
COMPLAINANT

VS.

Northern Kentucky Water District #1
(Name of Utility)
DEFENDANT

received Engineering
1/29/03
R.A.

COMPLAINT

The complaint of Robert W. Long respectfully shows:

- (a) Robert W. Long
(Your Full Name)
2319 Center St, Covington, KY 41014
(Your Address)
- (b) Northern KY Water District #1
(Name of Utility)
3049 Dixie Highway, P.O. Box 17010 Covington, KY 41017
(Address of Utility)
- (c) That: water pressure has been below standards for 12 yrs.
(Describe here, attaching additional sheets if necessary.)
Northern KY water district acknowledges this
the specific act, fully and clearly, or facts that are the reason
fact & assured Plaintiff & Neighbors water pressure
(and basis for the complaint.)
would be increased on Center St. on or before Jan. 1st, 2003
Jan 20th 2003 - Nothing has been done - water pressure
below minimum standards as confirmed by Water District #1.

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Formal Complaint

Robert W. Long vs. Northern Kentucky Water District

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At times water just Trickle's out of
shower receptacle. Defendant has told me
personally, this problem would be resolved
& I'd have more water than I needed over the last 2
years. Consistent Pattern of excuses & non-per-
formance by Defendant during this entire period.

Wherefore, complainant asks increased water pressure
(Specifically state the relief desired.)

for Houses on Center St in Covington, KY.
Defendant should be penalized for each
and every day this sub-Human service is
inflicted on the residents of Center St. ^{inhibited} water.

Dated at (1/20/03) Covington
(Your City) Kentucky, this 20th day

of January 2003
(Month)

Robert W. Long
(Your Signature)

(Name and address of attorney, if any)

807 KAR 5:001. Rules of procedure.

Section 12. Formal Complaints.

(1) **Contents of complaint.** Each complaint shall be headed "Before the Public Service Commission," shall set out the names of the complainant and the name of the defendant, and shall state:

(a) The full name and post office address of the complainant.

(b) The full name and post office address of the defendant.

(c) Fully, clearly, and with reasonable certainty, the act or thing done or omitted to be done, of which complaint is made, with a reference, where practicable, to the law, order, or section, and subsections, of which a violation is claimed, and such other matters, or facts, if any, as may be necessary to acquaint the commission fully with the details of the alleged violation. The complainant shall set forth definitely the exact relief which is desired (see Section 15(1) of this administrative regulation).

(2) **Signature.** The complaint shall be signed by the complainant or his attorney, if any, and if signed by such attorney, shall show his post office address. Complaints by corporations or associations, or any other organization having the right to file a complaint, must be signed by its attorney and show his post office address. No oral or unsigned complaints will be entertained or acted upon by the commission.

(3) **Number of copies required.** At the time the complainant files his original complaint, he must also file copies thereof equal in number to ten (10) more than the number of persons or corporations to be served.

(4) Procedure on filing of complaint.

(a) Upon the filing of such complaint, the commission will immediately examine the same to ascertain whether it establishes a prima facie case and conforms to this administrative regulation. If the commission is of the opinion that the complaint does not establish a prima facie case or does not conform to this administrative regulation, it will notify the complainant or his attorney to that effect, and opportunity may be given to amend the complaint within a specified time. If the complaint is not so amended within such time or such extension thereof as the commission, for good cause shown, may grant, it will be dismissed.

(b) If the commission is of the opinion that such complaint, either as originally filed or as amended, does establish a prima facie case and conforms to this administrative regulation, the commission will serve an order upon such corporations or persons complained of under the hand of its secretary and attested by its seal, accompanied by a copy of said complaint, directed to such corporation or person and requiring that the matter complained of be satisfied, or that the complaint be answered in writing within ten (10) days from the date of service of such order, provided that the commission may, in particular cases, require the answer to be filed within a shorter time.

(5) **Satisfaction of the complaint.** If the defendant desires to satisfy the complaint, he shall submit to the commission, within the time allowed for satisfaction or answer, a statement of the relief which he is willing to give. Upon the acceptance of this offer by the complainant and the approval of the commission, no further proceedings need be taken.

(6) **Answer to complaint.** If satisfaction be not made as aforesaid, the corporation or person complained of must file an answer to the complaint, with certificate of service on other parties endorsed thereon, within the time specified in the order or such extension thereof as the commission, for good

cause shown, may grant. The answer must contain a specific denial of such material allegations of the complaint as controverted by the defendant and also a statement of any new matter constituting a defense. If the answering party has no information or belief upon the subject sufficient to enable him to answer an allegation of the complaint, he may so state in his answer and place his denial upon that ground (see Section 15(2) of this administrative regulation).

807 KAR 5:001: Rules of procedure.

Section 15. Forms.

(1) In all practice before the commission the following forms shall be followed insofar as practicable:

- (a) Formal complaint.
- (b) Answer.
- (c) Application.
- (d) Notice of adjustment of rates.
- (2) Forms of formal complaint.
- (3) Form of answer to formal complaint.
- (4) Form of application.
- (5) Form of notice to the commission of adjustment of rates

Before the Public Service Commission

(Insert name of complainant)

Complainant

vs

(Insert name of each defendant)

Defendant

No. _____

(To be inserted by
the secretary)

COMPLAINT

The complaint of (here insert full name of each complainant) respectfully shows:

(a) That (here state name, occupation and post office address of each complainant).

(b) That (here insert full name, occupation and post office address of each defendant).

(c) That (here insert fully and clearly the specific act or thing complained of, such facts as are necessary to give a full understanding of the situation, and the law, order, or rule, and the section or sections thereof, of which a violation is claimed).

WHEREFORE, complainant asks (here state specifically the relief desired).

Dated at _____, Kentucky, this _____ day
of _____, 19 _____.

(Name of each complainant)

(Name and address of attorney,
if any)

Northern Kentucky Water District

January 30, 2003

Mr. Robert Long
2319 Center Street
Covington, KY 41011

Dear Mr. Long:

A letter dated December 19, 2002 was sent to the residents on Center Street to inform you of an improvement project that involves the construction of a new water main from Pointe Benton Drive to Center Street. This improvement will allow the District to increase the water main pressure in your area. The District has been successful in securing the water main easement which was necessary to begin the project. The Contractor plans to start construction within the next several weeks, pending favorable weather. Completion of the improvement is anticipated within 30 days of the start of construction.

In addition to the improvement referenced above, we are investigating the need for other improvements to Center Street that would further increase the flow and water quality. The improvement may involve either the rehabilitation or replacement of the existing water main along Center Street. We are very interested in receiving feedback from residents following the completion of the connection to the higher pressure zone to determine the impact of the project on water quality. This feedback will help us evaluate the need and timing for additional improvements.

Should you experience discoloration in your water, we request you contact our Customer Service Department at (859) 378-9898 to report the nature and extend of the occurrence. If you have any questions about the improvement projects, please feel free to contact me at (859) 426-2734. We appreciate your cooperation and understanding in this matter.

Sincerely,



Amy Kramer, P.E.
Design Engineering Manager

akk

cc: Donna Stucker, Public Service Commission

ATTACHMENT 2